




Ken Wagner, Ph.D.
Commissioner

State of Rhode Island and Providence Plantations
DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION
Shepard Building
255 Westminster Street
Providence, Rhode Island 02903-3400

Enclosure 3d
August 30, 2016

September 20, 2016

TO: Members of the Council on Elementary and Secondary Education

FROM: Ken Wagner, Ph.D., Commissioner 

RE: Feedback from Public Review and Comment on the Proposed Changes to the Certification Tests and Passing Scores (Braille, ASL, ESL)

The Regulations Governing the Certification of Educators in Rhode Island requires RIDE to seek Council approval for new or revised certification tests and passing scores that are required for initial certification.

The Educational Testing Service (ETS) provides most R.I. certification tests. One current test has been recently revised and RIDE is proposing the addition of two new tests. Rhode Island educators participated in all of the multi-state standard-setting studies. RIDE staff has reviewed the technical reports from the studies.

Attached please find the summary of the public feedback to the proposed recommended changes that the Council approved at its June 28, 2016, meeting, for the purpose of public review and comment.

RECOMMENDATION: THAT, the Council for Elementary and Secondary Education approves, the proposed changes to the certification tests and passing scores, as presented.

Public Comment Summary – ETS Tests

RIDE requested permission from the Council on Elementary and Secondary Education to seek public comment on the tests identified below. Public comment closed on August 8, 2016.

Test	Comment
American Sign Language Proficiency Interview (ASLPI) <u>Passing Score 170</u>	1 Comment Received Comment 1: The individual noted being curious about the interview and how it's different from other tests given the nature of the material. S/he wanted to know the purpose of testing, where the cut scores came from, if it was just a money maker and noted there must be other ways to show proficiency.
Braille Proficiency (0633) <u>Passing Score 169</u>	1 Comment Received Comment 1: The individual wonders how this test will function and admits knowing little about Braille and being so fascinated by the use. S/he notes that s/he is not a fan or advocate of the testing. Teachers show they are able to teach via course work, grades, and experience and think testing such as this is unnecessary and does not show what a person can do in the classroom with students. The individual also submitted questions about the number of Braille teachers and noted the test likely won't matter much. S/he wondered why RI was making it a requirement.
English to Speakers of Other Languages (5362) <u>Passing Score 155</u>	7 Comments Received Comment 1: The individual expressed concern with raising the cut score 10 points and noted that the current score is more aligned nationally. Comment 2: The individual expressed concern with raising the cut score 10 points and the impact on diversity of teachers in the field as a result. The individual noted that the score is not in line with other states and noted that we don't know what the impact will be of using the new test at standard setting cut score. Comment 3: The individual expressed concern with raising the cut score 10 points. The comment included a breakout of the topics included on the current test and wondered how the new test was different and if it would address content and practical knowledge of an ESL teacher. The individual also asked when standard setting took place and expressed a concern that perhaps no one from RIC was included in the process when they are the primary college with ESL candidates in programs for credential review. Additionally, a concern was expressed that since dual language teachers also have to take this test there are likely to be more individuals taking the test for whom English is not their first language and this could disadvantage them and the ability to get quality, trained teachers. The individual stated that the content on the test for bilingual education is only cursory and stated that an arbitrary high score would hurt our efforts with a Seal of Bi-literacy.

Telephone (401)222-4600 Fax (401)222-6178 TTY (800)745-5555 Voice (800)745-6575 Website: www.ride.ri.gov

The R.I. Board of Education does not discriminate on the basis of age, sex, sexual orientation, gender identity/expression, race, color, religion, national origin, or disability.

Finally, the individual wanted to remind us that there is an ELL Advisory Council that would be able to provide advice about the test and the cut score and potential implications in this field. This individual expressed that it should go through them first, prior to public comment. There was also concern about the timing of comment over the summer.

Comment 4: This individual wondered what makes this test different from an ELL or English test and if they could be adapted to meet all the needs.

Comment 5:

The individual expressed concern about raising this score by almost 10 points and noted that this test is only one measure of how successful and effective a language teacher will become in the classroom. Diversity could be negatively impacted in a shortage area by raising the score 10 points.

The individual stated that we have no experience with this measure and the RI representatives on the panel were not representative of ELs. S/he also noted that no bilingual teachers were included and no urban or higher education individuals were on the panel.

The respondent recommends following Virginia's lead by setting the score at 149, feeling that it's a more gradual increase from the current score.

Comment 6:

Nancy Cloud, on behalf of The Rhode Island Teachers of English Language Learners, the official affiliate of Teachers to Speakers of Other Languages, submitted a letter to express concern over the proposed ESOL Praxis Passing Score of 155 for the newly revised ESOL Praxis Exam (0532).

The letter expresses a concern with raising the passing score by 10 points without any experience or data to show how RI will perform. They're also concerned that there are no preparation materials.

The letter expressed concern that only 2 RI educators were included in the ETS panel and that ETS chose an individual from one of our low incidence districts, Burrillville. They do not understand why urban district (Providence, Pawtucket, Central Falls, Cranston, Cumberland, and East Providence) teachers weren't sent. They would also have wanted a RI teacher educator to be included since they know the TESOL standards best. They state that 20-24% of the study participants are not certified in ESL and that high school should have had more representation.

The new cut score may work against diversity efforts and legislation since bilingual educators must also pass this test. The cut score should challenge but not present a barrier to language minority students where there's a history of documented problems with standardized testing. We have a shortage of ELL teachers so we should not create an artificial barrier such as a score on a standardized test.

RI should follow Virginia's lead and set the cut score at 149. RI should consider that it's a new test and raising it by 9 points might exclude qualified teachers. The 149 set by Virginia is one conditional standard error of measure below the recommended cut score and they set this score to be as inclusive as possible while still having to take and pass the test at a high level. RI should reject the recommended score of 155 at least until we have experience that warrants raising it 9 points.

Comment 7

The Rhode Island English Language Learner Advisory Council submitted a letter expressing concerns. The letter expresses a strong concern with increasing the score of the test. They are concerned it will negatively impact shortages in this high need area. The letter notes that teacher diversity could also be impacted by the increased score since a barrier could be created.

The letter expresses concern that RI has no experience with the test and that RI representatives were not representative of where ELs are enrolled and no RI bilingual educators were included in the study. They state that previously a large panel from RI participated in standard setting and the score that was approved was set 2 points higher than the recommendation and now it's being increased even higher. The letter does note that currently most teachers meet the current passing rate, but only by a few points, but raising it further could have negative consequences.

The Advisory Council recommends following Virginia's lead and set the score at 149. It is an increase to the current score but at a smaller rate, better ensuring a barrier isn't created with testing that would stop otherwise qualified and competent professionals from teaching ELs.

Summary of Testing Changes for Approval

<p>Revised ESL test</p>	<p>The current test R.I. is using will be phased out in September. A new test has been developed. Two (2) R.I. teachers participated in the standard-setting study. R.I. must replace the current test with the new test.</p> <p>*RIDE is recommending the multi-state study score of 155.</p>
<p>Braille</p>	<p>R.I. Certification Regulations require proficiency in Braille for certification as a Visually Impaired Teacher PK-12.</p> <p>R.I. had not previously participated in a multi-state study for establishing a score.</p> <p>Two (2) R.I. teachers participated in the most recent standard-setting study.</p> <p>*RIDE is recommending the multi-state study score of 169.</p>
<p>American Sign Language</p>	<p>R.I. Certification Regulations require proficiency in American Sign Language for certification as a Deaf and Hard of Hearing Teacher.</p> <p>Until now a test was unavailable.</p> <p>The Educational Testing Services (ETS) has worked closely with Gallaudet University and will be offering the university developed assessment.</p> <p>*RIDE is recommending the score established by the American Sign Language Teachers Association, which is a 170.</p>

*** RIDE will review and adjust the cut-scores once R.I. data becomes available.**